

Hon. John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Mr. Kurt A. Benshoof, A.R.W. By and Through
His Father, Mr. Kurt A. Benshoof, Brett
Fountain, Urve Maggitti,

Plaintiffs,

vs.

ANDREA CHIN, ANTHONY BELGARD,
DONOVAN BROUSSARD, NATHAN
CLIBER, CATHERINE CORNWALL,
GREGG CURTIS, JANE DOE, JENNY
DURKAN, JOHN DUUS, NICHOLAS
EVANS, PASCAL HERZER, RYAN ELLIS,
MICHAEL FOX, TYLER GOSLIN, JULIE
KLINE, ERNEST JENSEN, JONATHAN
KIEHN, SPENCER KURZ, MAGALIE
LERMAN, RICHARD LIMA, ADAM
LOSLEBEN, YVES LUC, SARAH
MACDONALD, JACOB MASTERSON,
GRANT MAYER, STEVEN MITCHELL,
JOHNATHAN MUSSEAU, BREHON NESS,
LILIYA NESTERUK, STEPHEN
OKRUHLICA, KATRINA OUTLAND,
JESSICA OWEN, SARAH PENDLETON,
DWAYNE PIRAK, BRIAN REES, BLAIR
RUSS, JULIE SALLE, DANIEL SCHILLING,
TY SELFRIDGE, NATHAN SHOPAY,
STEVEN STONE, MICHAEL TRACY,
MELANIE TRATNIK, SARAH TURNER,
TREVOR TYLER, MICHAEL VIRGILIO,
ANDREW WEST, CHAD ZENTNER, In Their

No. 2:24-CV-00808-JHC

DECLARATION OF DALLAS LEPIERRE

Individual Capacities, CITY OF SEATTLE,
KING COUNTY,

Defendants.

I, DALLAS LEPIERRE, being familiar with the facts set forth herein based on my personal knowledge, and being competent to testify, hereby declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 and am competent to make this declaration.
2. All of the summons and complaints purportedly served on the City Defendants are being collected at this time.
3. Attached hereto as **Exhibit A** are true and correct copies of all such summons and complaints as have been currently gathered.
4. I am aware of no summons and complaint served on any City Defendant that had the summons properly signed and sealed.

Further the declarant sayeth naught.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 23rd day of May, 2025.

By: /s/ Dallas LePierre

Dallas LePierre, WSBA# 47391

Assistant City Attorney

E-mail: Dallas.LePierre@seattle.gov

Seattle City Attorney's Office

701 Fifth Avenue, Suite 2050

Seattle, WA 98104

Phone: (206) 684-8200

Attorney for Defendant City of Seattle

CERTIFICATE OF SERVICE

I certify that on the 23rd day of May, 2025, I caused a true and correct copy of this document to be served on the following in the manner indicated below:

<p>Kurt Alden Benshoof, DOC #448305 Washington Corrections Center (WCC) PO Box 900 Shelton, WA 98584</p> <p><i>[Pro Se Plaintiff]</i></p>	<p>(X) U.S. Mail (X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: kurtbenshoof@gmail.com; kurtbenshoof1@gmail.com DOCWCCInmateFederal@DOC1.WA.GOV</p>
<p>Brett Fountain 2100 West Northwest Highway 114 #1115 Grapevine, TX 76051-7808</p> <p><i>[Pro Se Plaintiff]</i></p>	<p>(X) U.S. Mail (X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: kb407@exposelegalcorruption.com</p>
<p>Urve Maggitti 244 Blackburn Drive Berwyn, PA 19312 917-340-0561</p> <p><i>[Pro Se Plaintiff]</i></p>	<p>() U.S. Mail (X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: urve.maggitti@gmail.com</p>
<p>Matthew Coughlan Darren Anthony Feider Monica Ghosh SEBRIS BUSTO JAMES 15375 SE 30TH PL, Ste 310 Bellevue, WA 98007 425-450-3382</p> <p><i>[Attorney for Fox, Goslin, Mitchell]</i></p>	<p>() U.S. Mail (X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: mcoughlan@sbj.law</p>
<p>Arick S. Bonsztyk 1000 Second Avenue, Suite 3660 Seattle, WA 98104 206-621-1871</p> <p><i>[Jessica Owen]</i></p>	<p>() U.S. Mail (X) CM/ECF () ABC Legal Messengers () Faxed () Via Email: asb@tbr-law.com</p>

1 Peggy C. Wu 2 KING COUNTY PROSECUTING 3 ATTORNEY'S OFFICE 4 701 Fifth Avenue, Suite 600 5 Seattle, WA 98104 6 206-263-4008 7 8 <i>[King County, Catherine Cornwall, and 9 Pascal Herzer]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email: pwu@kingcounty.gov
6 Howard Brown 7 1003 West Michigan Street 8 Hammon, LA 70401 9 10 <i>[Pro Se Interested Party]</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> CM/ECF <input type="checkbox"/> ABC Legal Messengers <input type="checkbox"/> Faxed <input type="checkbox"/> Via Email:

11 /s/ Grace Selsor

12 Grace Selsor, Legal Assistant